

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION

Peter Harris and Loni Harris,

*Plaintiffs,*

v.

Upwintrade.com, *et al.*,

*Defendants.*

Case No. 1:24-cv-00313-MJT

**Motion to File Documents  
Under Seal**

Pursuant to Local Rule CV-5 of the United States District Court for the Eastern District of Texas and the Protective Order entered by this Court on February 5, 2025,<sup>1</sup> Plaintiffs respectfully move to file the following documents under seal: Plaintiffs' Second Amended Complaint and Plaintiffs' Motion for Alternate Service.

**I. Basis for Sealing**

The documents sought to be sealed contain confidential information as defined by the Court's Protective Order, including sensitive financial data in the form of accountholder names and blockchain addresses provided to Plaintiffs by Binance Holdings, Ltd. The Protective Order permits the filing of such confidential information under seal to protect the parties' legitimate privacy interests. The

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<sup>1</sup> Dkt. 26.

Defendants in this matter are alleged scammers who have not yet made an appearance in this matter, and therefore Plaintiffs have not had the opportunity to confer with them regarding this motion.

## **II. Compliance with Local Rule CV-5**

Pursuant to Local Rule CV-5(a)(7)(C), this Motion is filed separately and immediately before the documents sought to be sealed. All documents to be sealed are marked “Filed Under Seal” at the top, as required. Counsel certifies that the documents contain confidential information as defined by the Protective Order and that sealing is necessary to protect the interests outlined therein.

WHEREFORE, Plaintiffs respectfully request that the Court grant this Motion and permit the filing of the identified documents under seal, consistent with Local Rule CV-5 and the Protective Order.

Dated: June 11, 2025

Respectfully submitted,

THE HODA LAW FIRM, PLLC

A handwritten signature in black ink, appearing to read "M Hoda". The signature is enclosed within a large, loopy, oval-shaped flourish.

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